

Message

From: Ungvarsky, John [Ungvarsky.John@epa.gov]
Sent: 5/2/2019 10:07:29 PM
To: Sutkus, Carol@ARB [carol.sutkus@arb.ca.gov]
CC: King, Scott@ARB [scott.king@arb.ca.gov]; Vanderspek, Sylvia@ARB [Sylvia.Vanderspek@arb.ca.gov]; Wehling, Jefferson [Wehling.Jefferson@epa.gov]; Lo, Doris [Lo.Doris@epa.gov]
Subject: RE: South Coast Rule 301 Parallel Processing

Hi Carol –

I need to defer to others, but I expect that you will need to indicate in your letter the specific sections that are being submitted. Let me confer with others here, and someone will get back to you.

John Ungvarsky

Environmental Scientist
USEPA Region IX, Air Division
San Francisco, CA
415-972-3963

From: Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>
Sent: Thursday, May 2, 2019 2:59 PM
To: Ungvarsky, John <Ungvarsky.John@epa.gov>
Cc: King, Scott@ARB <scott.king@arb.ca.gov>; Vanderspek, Sylvia@ARB <Sylvia.Vanderspek@arb.ca.gov>; Wehling, Jefferson <Wehling.Jefferson@epa.gov>; Lo, Doris <Lo.Doris@epa.gov>
Subject: RE: South Coast Rule 301 Parallel Processing

Thanks John,

Would it be best to say in our letter that we are submitting “the specific portions of Rule 301 as they relate to the Emission Statement requirements...”? That way if you realize you need a reference in another part of the rule that wasn’t listed, you can still use it.

Carol

From: Ungvarsky, John <Ungvarsky.John@epa.gov>
Sent: Thursday, May 02, 2019 2:40 PM
To: Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>
Cc: King, Scott@ARB <scott.king@arb.ca.gov>; Vanderspek, Sylvia@ARB <Sylvia.Vanderspek@arb.ca.gov>; Wehling, Jefferson <Wehling.Jefferson@epa.gov>; Lo, Doris <Lo.Doris@epa.gov>
Subject: RE: South Coast Rule 301 Parallel Processing

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Hi Carol –

Yes, the submittal should only be the portions of revised Rule 301 that address the emissions statement requirement (CAA section 182(a)(3)(B)). We haven’t seen the exact revisions that the District will make, but based on a prior version of the rule, Jeff Wehling had sent an email to the District to highlight the parts of Rule 301 that should be included in the submittal. They will need to add the certification requirement to the current Rule 301. See below.

John

From: Wehling, Jefferson [mailto:Wehling.Jefferson@epa.gov]

Sent: Friday, April 5, 2019 9:30 AM

To: Zorik Pirveysian <ZPirveysian@aqmd.gov>; Ungvarsky, John <Ungvarsky.John@epa.gov>; Sutkus, Carol (carol.sutkus@arb.ca.gov) <carol.sutkus@arb.ca.gov>

Cc: Graham, AshleyR <Graham.AshleyR@epa.gov>; Sarah Rees <SRees@aqmd.gov>; Veera Tyagi <vtvagi@aqmd.gov>; Hong, Jeanhee <Hong.Jeanhee@epa.gov>; Lee, Anita <Lee.Anita@epa.gov>; Brehler, Pippin@ARB <Pippin.Brehler@arb.ca.gov>; Whitney, Daniel@ARB <daniel.whitney@arb.ca.gov>; Barbara Baird <BBaird@aqmd.gov>; Scott King <sking@arb.ca.gov>; Zimpfer, Amy <Zimpfer.Amy@epa.gov>; Lo, Doris <Lo.Doris@epa.gov>

Subject: RE: Following up on South Coast ozone NPR and remaining needs

Zorik:

John and I just talked and believe that your idea is a good one, and may allow us to propose full approval of amended Rule 301(e)(1), (e)(8) and table III (including the newly-added certification requirement language) in the pending NPRM on the 2016 AQMP using our parallel processing procedure. Final action with respect to amended Rule 301(e)(1), (e)(8) and table III and the associated emissions statement SIP requirement would then wait until we receive the final adopted version of those portions of Rule 301 from CARB as a SIP revision. Just a thought – another possible location for the certification requirement might be at the end of Rule 301(e)(8)(A), a paragraph that relates directly to the emissions reporting requirement (as opposed to paragraph (e)(1) which directly addresses emissions fees and only indirectly relates to emissions reporting.

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From: Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>

Sent: Thursday, May 2, 2019 2:23 PM

To: Ungvarsky, John <Ungvarsky.John@epa.gov>; Lo, Doris <Lo.Doris@epa.gov>

Cc: King, Scott@ARB <scott.king@arb.ca.gov>; Vanderspek, Sylvia@ARB <Sylvia.Vanderspek@arb.ca.gov>

Subject: South Coast Rule 301 Parallel Processing

John and Doris,
I'm reviewing our draft letter to EPA requesting parallel processing of Rule 301 to meet the District's emission statement rule SIP requirements. We want to have it as ready-to-go as possible when we receive the request and package of publicly-noticed materials from the District.

I just put it together that this is also the District's fee rule. We do not submit fee rules into the SIP; in fact, we have had to withdraw several fee rules that were erroneously submitted at one point.

So my question is should we only be submitting a specific portion of the District's rule that applies to the emission statement requirement? In our records, it looks like a version of this rule was submitted into the SIP in 1983 and approved by EPA in 1984. There have been many amendments since then that were not submitted.

Thanks,

Carol



Carol Sutkus

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California Air Resources Board

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